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February - SO ORDERED

Honorable George B. Daniels  
United States District Court, S.D.N.Y.  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 11A  
New York, NY 10007

The initial conference scheduled  
for February 18, 2020 is  
adjourned to May 26, 2020 at  
9:30 a.m.

Re: *Trans Commodities, Inc. v. Rashid Temirbulatovich Sarsenov, et al.*  
S.D.N.Y. Case No. 19 Civ. 3874 (GBD)

*George B. Daniels*  
HON. GEORGE B. DANIELS

Dear Judge Daniels:

I am the attorney for plaintiff in the above-referenced action, in which the Court has scheduled an Initial Pretrial Conference for February 18, 2020 at 9:30 am.

Although the plaintiff in this action is a New York corporation, the ten defendants are individuals and business entities all residing or based in the Republic of Kazakhstan. To date, service has not been made on any of the defendants (and, therefore, no appearance has been made by any opposing counsel), as a result of which it is respectfully suggested that an appearance before the Court on the scheduled Conference date would not be fruitful. We have previously requested an adjournment of the Initial Pretrial Conference largely because there had been ongoing efforts at communications between intermediaries for plaintiff and the principal defendant, Mr. Sarsenov, in order to resolve the entire dispute. Those efforts appear to have broken down, and we are now committed to making arrangements for service upon defendants.

Based upon the foregoing, it is respectfully requested that the date of the Initial Pretrial Conference be postponed for at least ninety (90) days in order to allow for service as prescribed in FRCP Rule 4(f) (it being noted that the 90-day limit for service under Rule 4(m) does not apply where, as here, each of the defendants resides and is located outside the U.S.).

Respectfully yours,  
*Jeffrey C. Dannenberg*  
Jeffrey C. Dannenberg